

REMARKS

Claims 1-22 are pending in this application.

Applicants acknowledge that the previous grounds of rejection have been withdrawn in view of new grounds of rejection.

The Office Action rejects claims 1, 5, 7-16, 18-20 and 22 under 35 U.S.C. §103(a) over U.S. Patent No. 6,341,839 to Burikov et al. in view of U.S. Patent No. 5,670,995 to Kupcho. This rejection is respectfully traversed.

Independent claims 1, 11 and 22 recite a drive assembly for a printhead comprising, *inter alia*, at least two spaced rollers, at least one of which is a driven roller; an endless drive belt loop connected between said at least two spaced rollers for rotation thereabout to define an endless loop drive path; a drive mechanism that drives the endless drive belt loop in at least a first direction; a guide assembly configured to allow movement of the printhead around both linear and arcuate portions of the endless loop drive path; and a controller that controls the drive assembly to traverse over at least one-half the length of the endless drive belt loop to advance the printhead across a linear print zone and an arcuate non-print zone.

Applicants respectfully submit that even if combined, the combination as alleged must fail for several reasons. Thus, a *prima facie* case of obviousness has not been established.

First, the Office Action relies on element 2 in Burikov being the recited two spaced rollers. Rollers 2 are taught to be used for feeding a carrier and are not part of a printhead drive assembly. Moreover, the Office Action admits that Burikov fails to teach a driven roller. Thus, this claim element is lacking in Burikov.

Second, the Office Action relies on element 9 in Burikov being the endless drive belt loop "connected between said at least two spaced rollers for rotation thereabout to define an endless drive belt loop." Element 9 is a fixed unmovable guide and does not rotate about the

rollers as alleged. Thus, Burikov fails to teach a drive belt loop as claimed and further fails to teach that such a belt rotates about the two spaced rollers as claimed.

Third, the Office Action relies on col. 3, lines 8-10 in Burikov for a teaching that a drive mechanism drives the endless drive loop path in a first direction. This passage does not support a teaching of an endless drive loop belt being driven. Instead, it indicates that an ink head travels around element 9, which is fixed. Thus, Burikov fails to teach a drive mechanism that drives the endless drive loop path.

Fourth, the Office Action relies on Fig. 2 and elements 8, 9 for a teaching of a "printhead and carriage operably connected to the endless drive belt loop for movement therewith." However, as indicated earlier, element 9 is stationary and carriage 8 is movable relative to the fixed element 9. Thus, Burikov fails to teach a printhead and carriage operably connected to the endless drive belt loop for movement therewith as claimed.

Fifth, the Office Action relies on element 9 serving as both a guide assembly and the endless loop drive path.

Thus, the primary reference to Burikov is missing several features of independent claims 1, 11 and 22.

As agreed to during a prior personal interview, Kupcho fails to teach such features and instead uses a conventional traversing printhead guided along a linear path. Accordingly, Kupcho fails to overcome the deficiencies of Burikov. Moreover, the combination of Burikov and Kupcho is improper because both use completely incompatible drive structures and cannot be combined without destroying the functionality of the other. Kupcho relies on reciprocating drive belts to drive a head while Burikov teaches use of a fixed guide and a self-driven head that traverses around the guide.

Accordingly, because each and every feature of independent claims 1, 11 and 22 and claims dependent therefrom is not found in Burikov, even if impermissibly combined with Kupcho, these claims define over Burikov and Kupcho.

Dependent claims 1, 5, 7-10, 12-16, and 18-20 are allowable for their dependence on allowable base claims and for the additional features recited therein. For example, the Office Action admits that Burikov fails to teach the features of claims 5, 7, 9, 15, 16, and 20. For these features the Office Action relies on Kupcho. However, elements 116a/b are not diametrically opposed to one another on the endless loop drive path as recited in claims 7 and 16. Rather, each is provided on a separate belt assembly. Because Kupcho provides reciprocating linear printing, it is impossible for Kupcho to have two linear print zones and two arcuate non-print zones defined by one-half the circumference of the spaced rollers as recited in claims 5 and 15. Instead, there is a single linear print zone and the remainder of each belt (including the back linear side) is a non-print zone. Regarding claims 15, because Kupcho uses two separate printheads on separate belts, there is no need for a spacing S_N as recited. This is because each prints only on a single side and operates independent of the other printhead. However, because the two printheads as claimed rotate around an endless drive belt loop to print on both sides, the spacing becomes critical to coordinate the printing by the two printheads. This problem is neither appreciated nor solved by Kupcho.

Withdrawal of the rejection is respectfully requested.

The Office Action rejects claim 6 under 35 U.S.C. §103(a) over Burikov in view of Kupcho, further in view of U.S. Patent No. 4,980,009 to Goodwin et al. This rejection is respectfully traversed.

Independent claim 1, Burikov and Kupcho are discussed above. Goodwin fails to overcome the deficiencies of Burikov and Kupcho with respect to independent claim 1. Accordingly, dependent claim 6 is allowable for its dependence on allowable base claim 1

and for the additional features recited therein. Withdrawal of the rejection is respectfully requested.

The Office Action rejects claim 17 under 35 U.S.C. §103(a) over Burikov and Kupcho in view of U.S. Patent Appl. Publ. No. US2003/0227511A1 to Menendez. This rejection is respectfully traversed.

Independent claim 11, Burikov and Kupcho are discussed above. As admitted in the Office Action, both references fail to teach that at least two printheads operate simultaneously to provide two offset print swaths separated by a predefined spacing. Menendez fails to overcome the deficiencies of Burikov and Kupcho with respect to independent claim 11. Accordingly, dependent claim 17 is allowable for its dependence on an allowable base claim and for the additional features recited therein. Withdrawal of the rejection is respectfully requested.

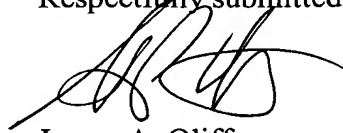
The Office Action rejects claim 21 under 35 U.S.C. §103(a) over Burikov and Kupcho, further in view of U.S. Patent No. 6,325,503 to McCue, Jr. et al. This rejection is respectfully traversed.

Independent claim 11, Burikov and Kupcho are discussed above. McCue, Jr. fails to overcome the deficiencies of Burikov and Kupcho with respect to independent claim 11. Accordingly, dependent claim 21 is allowable for its dependence on an allowable base claim and for the additional features recited therein. Withdrawal of the rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-22 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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